

**Before the
Federal Communications Commission
Washington D.C. 20554**

In the matter of

Amendment of Parts 13 and 80 of the)	WT Docket No. 00-48
Commission's Rules Concerning)	
Maritime Communications)	
)	
Petition for Rule Making filed by)	RM-9499
Globe Wireless, Inc.)	
)	
Federal Communications Bar Association's)	
Petition for Forbearance from Section 310(d))	
of the Communications Act Regarding Non)	
Substantial Assignments of Wireless Licenses)	
and Transfers of Control Involving)	
Telecommunications Carriers)	
)	
and)	
Personal Communications Industry Association's)	
Broadband Personal Communications Services)	
Alliance's Petition for Forbearance for Broadband)	
Personal Communications Services)	

**Comments by the
National GMDSS Implementation Task Force (The Task Force)**

Submitted 22 August 2000

The National GMDSS Implementation Task Force was chartered by the U.S. Coast Guard to supplement government functions in expediting the implementation of the Global Maritime Distress and Safety System (GMDSS) recently introduced by the International Maritime Organization (IMO). The Task Force membership is broad-based including nearly 1000 representatives of government authorities, commercial vessel owners and operators, recreational vessel interests, training institutions, service agents, manufacturers, trade associations and maritime labor organizations. The Task Force maintains a portion of the Coast Guard web site at www.navcen.uscg.mil/marcomms/ which contains numerous GMDSS Information Bulletins, records of Task Force meetings, and various Task Force letters recommending regulatory action.

The Task Force has made numerous recommendations to both the Coast Guard and the FCC, many of which have been adopted. The Task Force letter of 30 April 1999 to the Chief of the Telecommunications Wireless Bureau transmitted numerous recommendations for changes to Part 80 of the Commission's Rules most of which are cited in the NPRM. The Task Force appreciates the opportunity to comment on the proposed changes to Part 80 of the Commission's Rules.

The Task Force comments are in two sections, the first responding to general inquiries addressed in the NPRM and the second responding to specific rule changes proposed in the Appendix. The comments were approved at the Task Force meeting on 13 July 2000 and refer to specific page and paragraph numbers in the NPRM.

P 9, pp16 The FCC proposes to modify Sections 80.1111 (d); 80.1113 (d); and 80.1117 (a) to incorporate the latest IMO guidance on ship responses to DSC Distress calls. The Task Force concurs.

P 10, pp17 The FCC proposes to amend Section 80.1071 to provide a general exemption from certain GMDSS requirements for all vessels which sail continuously within 20 miles of the coast (the planned Sea Area A1) until 1 year after the Coast Guard establishes Sea Area A1 by declaring the coastal VHF-DSC network operational. The Task Force concurs with this proposal and recommends that the qualifying requirements should be continuous watch by the vessel on VHF Channel 16. The redrafted Section 80.1071 was not included in the appendix, however.

The FCC further proposes that Section 80.1123 (c) be updated and moved to Subpart G. The Task Force concurs with the proposal and with the redrafted Section 80.1123 (c) in the Appendix. It is noted, however, that the proposed ending date for the required watch on channel 16 is 1 February 2005. While in agreement with current IMO regulations, this date may be too early for U.S. application. The Coast Guard shore network upgrade to VHF-DSC is not scheduled for completion until about that date and could slip. It is therefore recommended that the ending date for ship watch on channel 16 be stated as 1 year after the Coast Guard declares Sea Area A1 operational or 1 February 2005, whichever is later.

P11, pp20 The FCC proposes to eliminate all of Subpart Q (Compulsory Radiotelegraph Installations for Vessels of 1600 Tons, Sections 80.801-80.836) with the exception of the Radar requirements in Section 80.825. The Task Force concurs in principle but notes that the Radar Section requires revision to reflect the new IMO requirements in Chapter V of SOLAS which should be approved before this Rulemaking is concluded. The RTCM reference should be updated to show 1800 Diagonal Road, Suite 600; Alexandria VA 22314; phone 703-684-4481, Fax 703-684-4429, email wtadams@rtcm.org. The FCC, however, only proposed changes to Section 80.807.

The FCC also requests comments as to whether there are any other requirements in Subpart Q which should be retained. The Task Force is of the opinion that the remainder of Subpart Q should be eliminated. In its initial filing the Task Force offered the alternative of retaining the Radiotelegraph requirements for voluntary application in the event that the FCC felt that retention was mandatory. Since the FCC seems amenable to deleting the Radiotelegraph Rules, and since it is considered generally undesirable to prescribe Rules for voluntary guidance, the Task Force concurs in deleting the Radiotelegraph Rules. Note that the FCC did not, however, delete Subpart Q in the Appendix.

P 12, pp22 The FCC seeks comment on which Subpart E Rules (General Technical Standards, Sections 80.201-80.229) require updating and which new Standards should be incorporated by reference. The Task Force concurs with the proposed updating with current standards promulgated by IMO, IEC, and ITU.

The FCC also seeks comments on how to simplify the means for keeping these general technical standards updated in the Rules as new versions are promulgated by the standards organizations. The Task Force believes that the FCC should seek changes in administrative procedures or law as necessary to enable permissive authority to utilize the latest version of a standard while waiting for a routine update of the Rules. The Task Force calls attention to ongoing negotiations between the U.S. and CEPT seeking a Mutual Recognition Agreement to facilitate recognition of new standards as they are promulgated.

P12, pp24 The FCC again notes with respect to Section 80.1123 (c) that they propose to require that (compulsory) ships maintain watch on VHF channel 16 until 1 February 2005. The Task Force comment is the same as that provided under Page 10, pp17 above; concur but require the watch until 1 February 2005 or one year after the Coast Guard declares Sea Area A1 operational, whichever is later.

The FCC also seeks comments as to the practicality of a voluntary watch on 2182 kHz by compulsory vessels when there is a significant number of non-compulsory vessels in the vicinity. The Task Force does not consider voluntary watches an acceptable solution to perceived needs for radio watches in selected areas and regards the ITU recommendation as directed primarily to Administrations. If the administration feels that a watch on 2182 kHz is required in a given area, the administration should require it and it should apply to both compulsory and voluntary vessels.

Since the Coast Guard is presently maintaining a continuous shore watch on 2182 kHz, the Task Force does not consider a watch on 2182 kHz by compulsory vessels to be necessary once the vessel has upgraded to MF-DSC. The Task Force does, however, consider that the MF watch by compulsory vessels needs to be upgraded to MF/DSC within one year after the Coast Guard declares Sea Area A2 operational. The Task Force further notes that vessels using MF-DSC voluntarily would be obliged to watch 2187.5 kHz in accordance with section 80.1123 (a) (2).

The FCC also seeks comment on their proposal that vessels voluntarily equipped with VHF-DSC be required to maintain watch on channel 70 whenever the vessel is underway. The Task Force concurs with this proposal which is in accordance with ITU regulation S31.17 and which should make a major contribution to the collective marine safety.

P 14, pp26 The FCC seeks comments on their proposal to permit other emissions on frequencies restricted to Morse Code. The Task Force concurs with this proposal.

The FCC also seeks comments on specific ITU Regulations which should be implemented. The Task Force notes that the ITU regulation cited above, requiring a watch by all vessels on VHF-DSC channel 70 also applies to other voluntarily fitted MF/HF-DSC and Inmarsat stations and recommends that the FCC Rules similarly require watch by voluntarily fitted vessels on the MF/HF DSC channels and Inmarsat A, B, and C systems. The watch on Inmarsat systems is, of course, not to receive alerts from other ships but to enable contact by shore rescue authorities to resolve false alerts or arrange assistance for another vessel in distress.

Radio Regulation S32.5B requires that vessels fitted with GMDSS systems capable of transmitting an automatically generated distress alert which includes position, must have an integral or connected navigation receiver input if one is installed. The Task Force considers this a necessary requirement for both compulsory and voluntary vessels in view of the large number of alerts received without positions and with erroneous positions.

The FCC seeks comments on their proposal to delete Section 80.353, General uses, radiotelegraphy, removing reference to 500 and 8364 kHz as distress and safety frequencies, and eliminating the Morse Code frequencies. The Task Force concurs.

The FCC further invites comments on whether other revisions to Subpart H, Frequencies, (Sections 80.351-80.391) should be considered. The Task Force recognizes that because of regulatory actions taken in the early period of VHF implementation, the full international VHF Maritime Band is not available in the U.S. The Task Force points out that as a result there is an extreme shortage of available VHF channels and recommends that all available solutions such as narrow banding should be undertaken to provide relief.

P 15, pp28 The FCC seeks comments on its tentative conclusion that Subpart R (Compulsory Radiotelephone Installations for Vessels 300 Tons, Sections 80.851-80.879) be deleted with the exception of Section 80.879 dealing with Radar requirements. The Task Force concurs noting, however, that the basic radiotelephone rules appear to be needed to cover mandatorily equipped vessels until such time as they are required to upgrade to GMDSS DSC systems. Therefore the Task Force suggests that Subpart R can be deleted one year after the Coast Guard has declared both Sea Areas A1 and A2 operational. It is noted, however, that the FCC did not recommend deletion of Subpart R in the Appendix

With respect to the Radar requirements in Section 80.879, the Task Force concurs with retention of the section noting, however, that it merely refers to Section 80.825 which is also being retained.

P 15, pp29 The FCC has proposed to remove the certification for Class A, B, C, and S EPIRBs operating on 121.5/243 MHz as recommended by the Coast Guard and planned by COSPAS/SARSAT. The Task Force concurs but notes that portions of the Rules pertaining to 121.5/243 MHz EPIRBs may need to be retained until the phase out date. The RTCM reference should be updated to show 1800 Diagonal Road, Suite 600, Alexandria VA 22314; phone 703-684-4481, Fax 703-684-4429, email wtadams@rtcm.org.

The Task Force also recommends that the FCC Rules accept the Inmarsat-E EPIRB for use by U.S. vessels operating solely within the Inmarsat coverage footprint subject to incorporating a 121.5 MHz homing capability, a strobe light, and an integral GPS receiver. The Inmarsat-E EPIRB is approved in the IMO GMDSS regulations and the system is now fully operational.

P 19, pp32 The FCC proposes that the temporary, conditional exemption from GMDSS DSC requirements granted to fishing vessels be terminated one year after the Coast Guard declares Sea Areas A1 and A2 operational. The Task Force concurs with this proposal noting that the GMDSS should be considered the standard marine safety system in the U.S. and that appropriate elements should be required not only for compulsory vessels above 300 tons but for smaller vessels mandatorily equipped for safety purposes. The Task Force believes that it is also important for smooth functioning of the Coast Guard's shore communication network including operator training that all vessels, domestic and foreign, utilize a common radio safety system.

The Task Force notes that the commercial fishing industry is one of the most hazardous sectors of the maritime community and that its safety record warrants improved safety radio services. The Task Force acknowledges that the temporary exemption provided to fishing vessels probably did place them at a somewhat greater safety risk. However, the Task Force concurs that extending the temporary A1 and A2 exemptions for fishing vessels as proposed by the FCC until one year after the Coast Guard declares Sea Areas A1 and A2 operational is a reasonable course of action.

P 18, pp33 The FCC further seeks comments on their belief that fishing vessels should meet the same level of safety requirements as other segments of the maritime industry. Because fishing vessels in general have a much worse safety record than other segments of the maritime community, the Task Force feels that full GMDSS compliance is an appropriate goal. The Task Force notes that fishing vessels are not included in the IMO's GMDSS requirements only because a separate Fishing vessel treaty was intended to cover fishing vessels but has not come into force. The proposed treaty, however, called for full GMDSS participation for fishing vessels of 24 meters and larger. Furthermore, both Canada and the European Common Market have required full GMDSS participation for fishing vessels of comparable size.

P 19, pp36 The FCC seeks comment as to whether a Restricted GMDSS Radio Operator's License should be established for operators of compulsory vessels which sail exclusively in Sea Areas A1 or A2. The Task Force agrees that this is appropriate for Sea Area A1 and could be extended to Sea Area A2 if appropriate. The Task Force also concurs with the FCC's proposed examination requirements and is prepared to recommend an appropriate question pool for Sea Area A1 License examinations. The Task Force is also prepared to recommend to the Coast Guard a model course for Sea Area A1 training to comply with IMO-STCW requirements.

While the international rules seem to validate the Restricted GMDSS Operator License for Sea Area A1 only, the U.S. will have an A2 area some 5 years before it has an A1 area. The Task Force is not aware of whether there are a significant number of prospective Sea Area A2 vessels. If so, they have either already equipped for A3 or are operating under a temporary FCC waiver.

The Task Force also recommended that a Restricted GMDSS License be established to fill a need for voluntary training by recreational vessel operators who will soon begin using VHF-DSC but who are not required to hold station licenses or operator licenses, or receive any training. The sheer numbers of such craft pose a serious false alarm threat to the safety system unless the voluntary training objectives can be met. Model Courses are now under development for this voluntary training but they may need to be of a shorter duration than training for a Coast Guard GMDSS Certification for Sea Area A1. It is intended that recreational vessel operators could obtain a Certificate of Completion from a voluntary training organization which might qualify for an insurance discount.

The Task Force has recommended that compulsory vessels under the Communications Act be mandatorily upgraded to VHF-DSC and MF-DSC as appropriate within one year after the Coast Guard declares Sea Areas A1 and A2 operational. Under those circumstances, operators of those mandatorily equipped vessels should be required to hold the Restricted GMDSS Radio Operator's License.

P 20, pp38 The FCC also notes that on 1 February 2002, all masters and mates must hold the FCC GMDSS Radio Operator's License and must also qualify for the Coast Guard's GMDSS-STCW endorsement. At present, however, the FCC Rules only require 2 licensed GMDSS operators and no change has been proposed. The Coast Guard, however, under 46 CFR 10.205(n) requires that all candidates for GMDSS STCW Certification hold the FCC GMDSS Operator's License.

P20, pp39 The FCC proposes to authorize automatic issuance of their GMDSS Radio Operator's License to successful graduates of a Coast Guard approved GMDSS operator's training course. The Task Force concurs with this action. The Task Force also concurs with the automatic issuance of a Restricted GMDSS Radio Operator's License to successful graduates of a Coast Guard approved GMDSS operator's training course for Sea Area A1. The Task Force feels, however, that it would be premature to extend this process to GMDSS Maintainer Licenses since there are presently no Coast Guard approved courses for such training nor is there a prospective requirement under IMO STCW rules.

The following comments refer to the Appendix to FCC WT Docket 00-48 by Page and Paragraph Number.

The Task Force wishes to make a general statement calling attention to a major problem in GMDSS licensing. The current FCC practice of issuing GMDSS licenses based solely on passing a multiple choice examination without mandatory training and a practical demonstration of operator competence, does not satisfy U.S. treaty obligations under the IMO's STCW 95 Convention. These tightened licensing rules were adopted deliberately in response to widespread evidence of operator incompetence. It is realized that the Coast Guard has taken on the task of separately certifying the competence of U.S. deck officers to meet the STCW requirements and that the new STCW requirements do not become effective until 1 February 2002. Never-the-less, the FCC's GMDSS Operator License (which is not presently being issued in accordance with the STCW criteria) is likely to be recognized by other nations as evidence of STCW compliance. If the FCC intends to modify its licensing procedures to comply with STCW requirements, the appropriate changes to the Rules need to be promulgated as part of the Report and Order resulting from this NPRM. The Task Force strongly recommends that this be done.

P 26, pp3 The Task Force concurs with the reworded Sections 13.13 (a) and (d), Application for a license.

P 27, pp4 The Task Force concurs with the reworded Section 13.17 (b), Replacement license.

P 27, pp5 The Task Force concurs with the new Section 13.201, (b), (7), Qualifying for a commercial operator license but notes that the new procedure for granting licenses automatically based on successful completion of Coast Guard approved training courses has not been included.

SUBPART A - General Information (Sect 80.1-80.5)

P 28, pp2 The Task Force concurs with the new definitions in Section 80.5 but suggests that two additional definitions be added to take into account the privatization of Inmarsat that entered into force on April 15, 1999. The following new definitions are suggested:

Inmarsat: Inmarsat Ltd. Is a private commercial company licensed in the United Kingdom.

IMSO: The International Mobile Satellite Organization (IMSO) is a residual intergovernmental organization which was established to ensure that Inmarsat Ltd. complies with its public service obligations.

SUBPART B - Applications and Licenses (Sect 80.11-80.59)

P 28, pp2-5 The Task Force concurs with the revised Section 80.5, Definitions of Digital Selective Calling, Distress Signal, Safety Signal, and Urgency Signal and amendment of Section 80.15.

SUBPART C - Operating Requirements and Procedures (Sect 80.61-80.149)

P 29, pp5 The Task Force concurs with deletion of Section 80.89 (e), Unauthorized transmissions, and the intent of adding (c) (2) to require continuous service for both GMDSS ships and ships voluntarily fitting GMDSS subsystems. However, the Task Force does not concur with placing the new subsection (2) under the heading of compulsory ships since the voluntary fit GMDSS ships are not compulsory. The Task Force would prefer to see the GMDSS ships treated under the “compulsory ships” heading with a new heading for “Ships Voluntarily Fitting GMDSS Subsystems”.

P 29, pp7 The Task Force concurs with new Section 80.102 (e), Radiotelephone station identification.

P 30, pp8 The Task Force notes that the revision to Section 80.103 (c), DSC operating procedures was intended to reflect the guidance in ITU-R M 541. The Task Force recommends instead that the guidance be drawn from IMO COMSAR/Circ.21 which is a more recent update and which has been recommended to ITU for harmonization.

P 30, pp9 The Task Force concurs with the deletion of Section 80.116 (h) Radiotelephone operating procedure for ship stations.

P 30, pp10 The Task Force concurs with the redrafting of Section 80.141 (c), General provisions for ship stations.

P 30, pp11 The Task Force concurs with the deletion of Section 80.145, Class C EPIRBs.

The Task Force repeats its earlier recommendation that Section 80.146, Watch on 500 kHz, be deleted as obsolete. Section 80.146 was not addressed in the current NPRM.

The Task Force repeats its earlier recommendation that Section 80.147 Watch on 2182 kHz needs revision. It presently refers to Section 80.304 (b), an obsolete Section dealing with silence periods. The Task Force recommends that compulsory ship watches on 2182 kHz be required until the vessel upgrades to MF-DSC or until one year after the Coast Guard declares Sea Area A2 operational. Section 80.147 was not addressed in the current NPRM.

P 30, pp12 The Task Force concurs with the amendment to Section 80.148, Watch on VHF channel 16 except that the date should be qualified to read “until 1 February 2005 or until one year after the Coast Guard declares Sea Area A1 operational, whichever is later”. The Task Force applauds the

rationale for interoperability between compulsory and non-compulsory vessels and notes that after termination of the required watch on channel 16, safety communications interoperability can be maintained on the bridge to bridge channel.

SUBPART D - Operator Requirements (Sect 80.151-179)

P 31, pp13 The Task Force concurs with the addition to Section 80.151, Classification of operator licenses, to recognize the GOL and ROL Licenses.

P 31, pp14 The Task Force concurs with the addition of new subsection 80.159, Operator requirements of Title III of the Communications Act and the Safety Convention, defining the operator licenses required for GMDSS passenger ships.

P 31, pp15 The Task Force concurs with the addition of ROL to Section 80.165, Operator requirements, for DSC ship telephone operators.

SUBPART E - General Technical Standards (Sect 80.201-229)

P 32, pp16 The Task Force concurs with the revision to paragraph 80.203 (g), Authorization of transmitters, except that the phrase "...or the United States Signatory" should be deleted as it is no longer appropriate.

P 32, pp17 The Task Force concurs with the revision to Section 80.205, Bandwidths.

P 33, pp18 The Task Force concurs with revision to Section 80.207, Classes of Emission.

P 34, pp19 The Task Force concurs with revision to Section 80.223, Survival Craft Stations.

SUBPART F - Equipment Authorization for Compulsory Ships (Sect 80.251-273)

The FCC proposed no changes in Subpart F. The Task Force repeats its earlier recommendation that Subpart F be deleted since it is obsolete and Subpart W contains all the guidance required by compulsory vessels.

SUBPART G - Safety Watch Requirements and Procedures (Sect 80.301-333)

The FCC made no recommendations for Subpart G except with respect to Section 310. The Task Force considers that much of Subpart G is obsolete and renews its earlier recommendations relative to the following Sections:

80.301-302 Coast Station Watch requirements - Delete entirely or provide a new section limited to VHF Public Coast Stations.

80.303 Watch on 156.8 MHz - Delete if Coast Guard watch is considered adequate.

80.304 Watch requirements during silence periods - Delete entirely.

80.305 Watch requirements of the Comm. Act and the Safety Convention - Delete (a)(1) regarding 500 kHz; delete (a)(2) regarding 2182 kHz one year after the Coast Guard has declared Sea Area A2 operational and mandatory vessels have been shifted to MF-DSC and required to watch 2187.5 kHz; edit (a)(3) on channel 16 watch to indicate mandatory watch by compulsory vessels until 1 February 2005 or one year after the Coast Guard has declared Sea Area A1 established whichever is later, and mandatory vessels have been shifted to VHF-DSC and required to watch VHF channel 70. Edit (b)(1),(2),

and (3) to reflect the upgraded watches including Inmarsat and add a requirement to copy NAVTEX and SafetyNET MSI broadcasts as appropriate.

80.306-307 Radiotelegraph Watch and Alarm - Delete.

P 34, pp20 The Task Force concurs with revision to Section 80.310, Watch by voluntary vessels with the exception of the last sentence. If the last sentence applies to vessels voluntarily fitting radio systems capable of sending automatic distress alerts, it should be rephrased accordingly.

80.313 Frequencies for Distress - Edit to remove 500 and 8364 kHz and insert DSC, Inmarsat, and EPIRB frequencies.

80.314 Distress Signals - Edit to delete (a) and add DSC, Inmarsat, and EPIRB signals.

80.315 Distress Calls - Edit to delete (a) and add DSC and Inmarsat calls.

80.316 Distress Messages - Edit to delete (a) and add DSC and Inmarsat messages.

80.317 Alarm Signals - Edit to delete (a).

80.318 Use of Alarm Signals - Edit to delete radiotelegraph signals.

80.319 Radiotelegraph Procedures - Delete

80.320 Radiotelephone Procedures - Edit to incorporate DSC.

80.321-329 - Edit to incorporate DSC and GMDSS procedures.

SUBPART H - Frequencies (Sect 80.351-391)

P 35, pp21 The Task Force concurs in removing Section 80.353, General Radiotelegraphy.

P 35, pp22 The Task Force concurs with revisions to Section 80.355, Distress, urgency, safety, call and reply and Morse code frequencies, but recommends that (2) cite the EPIRB band 406-406.1 MHz since current planning envisions deployment of EPIRBs on additional frequencies in the band. The Task Force also recommends adding provisions for use of the Inmarsat-E EPIRB by U.S. vessels operating solely within the Inmarsat coverage footprint.

P 35, pp23 The Task Force concurs with the revision to Section 80.357, Working Frequencies.

P 36, pp24 The Task Force concurs with the revision to Section 80.361, NBDP Frequencies.

P 36, pp25 The Task Force concurs with the revision to Section 80.373, Private Communication.

The Task Force also recommends that Section 80.383 be expanded with a new sub section to recognize the routine practice by which VTS operators ashore accept the distress watch on channel 16 on behalf of vessels within its jurisdiction which have shifted their VHF guard to the VTS sector frequency. The prescribed distress, VTS, and bridge-to-bridge watches often exceed the number of transceivers available.

SUBPART I - Station Documents (Sect 80.401-417)

P 39, pp26 The Task Force concurs generally with the revisions to Section 80.401, Station Documents but recommends that the Radio Station Categories which presently read "Telephone: Title III,

Part II etc.” be changed to describe the vessel type. As presented, the vessel type cannot be readily determined without reference to the Communications Act.

P 41, pp27 The Task Force concurs with the revision to Section 80.405, Station License.

P 41, pp28 The Task Force concurs with the revision to Section 80.409, Station Logs, but recommends that the phrase “Officer of the Deck” in (e)(7) be replaced with “Officer of the Navigational Watch” to be consistent with IMO phraseology.

P 42, pp29 The Task Force concurs with the revision to Section 80.415, Publications except to note that the table does not include the GMDSS Master Plan, NIMA Pub. 117, or the Admiralty Volume 5 document, any one of which should be carried as noted in 80.415 (b).

SUBPART Q - Compulsory Radiotelegraph for Vessels 1600 Tons (Sect 80.801-836)

P 42, pp30 The Task Force concurs with the revision to Section 80.807, Radiotelephone Installations, but notes that the FCC earlier proposed eliminating most of Subpart Q. The Task Force renews its recommendation that most of Subpart Q is obsolete and should be deleted. Sections 80.807 and 80.825 can be moved to another Subpart. The Radar requirements outlined in Section 80.825 should be checked against the latest revision of SOLAS, Chapter 5.

SUBPART R - Compulsory Radiotelephone for Vessels 300 Tons (Sect 80.851-879)

The Task Force notes that the FCC proposed deleting most of Subpart R with the exception of the Radar Section, 80.879, but this was not done. The Task Force renews its earlier recommendation for deletion of most of Subpart R

SUBPART S - Compulsory Radiotelephone for Small Passenger Vessels (Sect 80.901-935)

P 43, pp31 The Task Force concurs with the revision to Section 80.905, Vessel Radio Equipment, except for the following points:

(a) (1) Compulsory vessels should be required to upgrade to VHF-DSC within one year after the Coast Guard declares Sea Area A1 operational.

(a) (2) Compulsory vessels should be required to upgrade to MF-DSC within one year after the Coast Guard declares Sea Area A2 operational.

(a) (4) (iii) The Task Force does not agree to retention of this sub-section permitting a compulsory vessel operating more than 200 miles offshore to use HF-SSB in lieu of the HF-DSC channels prescribed for GMDSS. The Task Force also notes that Inmarsat should be added as an option for these vessels. The Coast Guard watches on non DSC HF channels are not as reliably maintained and do not enable a comparable safety service. See also the Task Force comments on P 19, pp32 above stressing the benefits of GMDSS as a single safety system applicable to all mandatory vessels.

(d) The Task Force does not concur in accepting a single portable VHF-DSC as equivalent to an installed VHF-DSC system. There are few if any VHF-DSC portables available in the marketplace and they usually operate at reduced power which may be insufficient for distress alerting.

P 44, pp32 The Task Force concurs with the revision to Section 80.933 (c) except that the exemption should be extended to 1 year after the Coast Guard declares Sea Areas A1 and A2 operational.

SUBPART V - EPIRBs (Sect 80.1051-1061)

P 45, pp33 The Task Force concurs with the revision to Section 80.1053, Class A EPIRBs.

P 45, pp34 The Task Force concurs with the revision to Section 80.1055, Class B EPIRBs.

P 45, pp35 The Task Force concurs with removal of Section 80.1057, Class C EPIRBs.

P 45, pp36 The Task Force concurs with the revision to Section 80.1059, Class S EPIRBs.

Section 80.1060 The Task Force recommends that this vacant Section be used to authorize the Inmarsat-E EPIRB for use by U.S. vessels noting that the system is operational and has been accepted by the IMO for use by GMDSS ships. The 121.5 MHz homing facility, strobe light, and integral GPS receiver should also be required for U.S. users.

P 45, pp37 The Task Force concurs with the revision to Section 80.1061, Special Requirements for 406 EPIRBs, except that the reference to the Commandant (G-MVI) should be updated to (G-MSE).

SUBPART W - GMDSS (Sect 80.1065-1135)

P 46, pp38 The Task Force concurs with the revision to Section 80.1073, Radio Operator Requirements, except to propose a slight rewording of (b) (6) to read: “Responsible for ensuring that the ship’s navigation position is entered into all installed DSC equipment, either automatically through a connected or integral navigation receiver, or manually at least every four hours when the ship is underway.”

P 47, pp39 The Task Force concurs with the revision to Section 80.1074, at-sea maintenance, but notes that ships electing at sea maintenance should also be required to carry equipment repair manuals, manufacturer’s recommended spare parts, and appropriate test equipment.

P 47, pp40 The Task Force concurs with the revision to Section 80.1077, Frequencies, except to recommend that the listing for INMARSAT Ship Earth Stations be expanded to show “INMARSAT Ship Earth Stations accepted by IMO for GMDSS”; i.e. include Inmarsat B and E. There are several other references to Inmarsat which may also need to be revised, as appropriate, along similar lines, including: 80.1087(a)(5), 80.1089(a)(3)(iii), 80.1091(a)(1), (a)(4)(iii), and (b)(3)(ii).

P 48, pp41 The Task Force concurs with the revision to Section 80.1083, Ship Radio Installations.

P 48, pp42 The Task Force concurs with the revision to Section 80.1085, Radio Equipment General. With respect to NAVTEX receivers, the current language in Sections 80.1085(a)(4), Ship Radio Equipment and 80.1101(c)(1), Performance Standards, describe GMDSS approved receivers. The Task Force additionally proposes recognition of a type of NAVTEX receiver which has a VDU unit instead of a printer. This has been used successfully in Europe and has encouraged many voluntary vessels to fit with NAVTEX. It is attractive since it doesn’t consume large volumes of paper, a major complaint of GMDSS vessels to the Task Force. Initially, it would only be available for non-GMDSS vessels in the U.S. pending amendment of IMO GMDSS specifications.

P 48, pp43 The Task Force concurs with the revision to Section 80.1091, Radio Equipment, Sea Areas A1, A2, and A3. The Task Force notes, however, that this change, would allow non-GMDSS satellite systems to be used as an alternative for U.S. GMDSS domestic vessels. Such waivers should be considered on a case-by-case basis.

P 49, pp44 The Task Force concurs with the revision to Section 80.1099, Sources of Energy.

P 49, pp45 The Task Force concurs with the revision to Section 80.1101, Performance Standards.

- P 52, pp46 The Task Force concurs with the revision to Section 80.1111, Distress Alerting.
- P 52, pp47 The Task Force concurs with the revision to Section 80.1113, Transmission of Alert.
- P 52, pp48 The Task Force concurs with the revision to Section 80.1117, Receipt and acknowledgement of distress alerts.
- P 53, pp49 The Task Force concurs with the revision to Section 80.1121, Receipt and acknowledgement of distress alerts by ship stations and ship earth stations.
- P 53, pp50 The Task Force concurs with the revision to Section 80.1123, Watch requirements for ship stations, except that the watch on channel 16 should be continued until 1 February 2005 or until the Coast Guard declares Sea Area A1 operational, whichever is later. An additional sentence should be added to require upgrade of the watch to VHF-DSC channel 70 when so equipped. For mandatory vessels, the upgrade must occur within one year after the Coast Guard declares Sea Area A1 operational.

There are other general changes to the Rules which would be beneficial but which were not treated in the NPRM. These are strongly recommended by the Task Force but are listed here with minimal comment:

1. Include enabling language for the Automatic Identification System (AIS) which will likely be implemented before another FCC Rules change. This should include provisions for AIS frequency assignments.
2. The Task Force renews its proposal to the FCC to accept email as a permitted mode for making official requests and reports required under Part 80 of the Rules. The Task Force acknowledges, however, that this is a broader issue than Part 80 alone.
3. Recognizing that the NPRM is not the appropriate vehicle to update the Great Lakes Agreement (GLA), the Agreement is still in need of updating. Mandatory U.S. vessels on the Great Lakes should be required to shift to VHF-DSC within a year of upgrading the shore watch to DSC. The FCC and the Coast Guard should enter into discussions with their Canadian counterparts on the whole range of appropriate GMDSS services on the Lakes and updating of other obsolete provisions leading toward a revision of the GLA.

Respectfully submitted,

U.S. GMDSS IMPLEMENTATION TASK FORCE

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